

UNITED STATES DISTRICT COURT

for the

Eastern District of North Carolina

EASTERN Division

4:19-CV-46-FL

RECEIVED

APR - 4 2019

JAA
PETER A. MOORE, JR., CLERK
US DISTRICT COURT, EDNC

Christopher Dolin

Case No.

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Jury Trial: (check one)

Yes

No

Jordan Kindred, Karen Craig, Jeffery Newton &
Walter Minton

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Christopher Dolin
Street Address	424 Beasley Drive, Apartment R7
City and County	City of Greenville, Pitt County
State and Zip Code	NC 27834
Telephone Number	(914)-727-0321
E-mail Address	chrisva23451@icloud.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title *(if known)*. Attach additional pages if needed.

Defendant No. 1

Name	Jordan Kindred
Job or Title <i>(if known)</i>	Officer , Riverside Regional Jail Authority
Street Address	500 Folar Trail
City and County	North Prince George, Prince George County
State and Zip Code	VA 23860
Telephone Number	(804)-524-6600
E-mail Address <i>(if known)</i>	

Defendant No. 2

Name	Karen Craig
Job or Title <i>(if known)</i>	Acting Superintendent, Riverside Regional Jail Authority
Street Address	500 Folar Trail
City and County	North Prince George, Prince George County
State and Zip Code	VA 23860
Telephone Number	(804)-524-6600
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	Colonel Jeffery Newton
Job or Title <i>(if known)</i>	Retired Superintendent, Riverside Regional Jail Authority
Street Address	500 Folar Trail
City and County	North Prince George, Prince George County
State and Zip Code	VA 23860
Telephone Number	(804)-524-6600
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	Major Walter Minton
Job or Title <i>(if known)</i>	Deputy Superintendent, Riverside Regional Jail Authority
Street Address	500 Folar Trail
City and County	North Prince George, Prince George County
State and Zip Code	VA 23860
Telephone Number	(804)-524-6600
E-mail Address <i>(if known)</i>	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

<input type="checkbox"/>	Federal question	<input type="checkbox"/>	Diversity of citizenship
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Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

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B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name)	Christopher Dolin	, is a citizen of the
State of (name)	North Carolina	.

b. If the plaintiff is a corporation

The plaintiff, (name)		, is incorporated
under the laws of the State of (name)		,
and has its principal place of business in the State of (name)		

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, (name)	Jordan Kindred	, is a citizen of
the State of (name)	Virginia	. Or is a citizen of
(foreign nation)		.

b. If the defendant is a corporation

The defendant, (name)		, is incorporated under
the laws of the State of		, and has its
(name)		
principal place of business in the State of (name)		.
Or is incorporated under the laws of (foreign nation)		,
and has its principal place of business in (name)		.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy-the amount the plaintiff claims the defendant owes or the amount at stake-is more than \$75,000, not counting interest and costs of court, because *(explain)*:

\$95,197 plus interest and costs of court due to Defendant Kindred's ongoing harassment towards Plaintiff's spouse (Christina Rawls-Dolin) & it's affect on Plaintiff's family to include having to maintain separate households. Defendants Craig, Newton & Minton are equally liable for the same amount due to allowing an open acceptance of sexual harassment to be present in their facility.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

On or about 2 January 2018, Defendant Kindred began to sexually harass Plaintiff's spouse (Mental Health Specialist employed by Corizon Health at the Riverside Regional Jail) and pursue into a dating/sexual relationship. On or about 28 April 2018, Defendant Kindred's actions towards Rawls-Dolin resulted in Plaintiff vacating the shared residence. On or about 1 September 2018, the relationship was ended by Rawls-Dolin. Since then, Defendant Kindred has continued to sexually harass Rawls-Dolin to include touching, verbal communications & stalking.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include

the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Plaintiff is requesting damages in the amount of \$75,001 for mental anguish, emotional distress and loss of enjoyment of life; \$20,196 for expenses incurred to maintain separate houses plus interest & costs of court effective date of judgement. Defendant Kindred's ongoing harassment combined with Defendants Craig, Newton & Minton's casual allowance of this behavior in their environment have resulted in Plaintiff's loss of enjoyment of life. Defendants Craig, Newton & Minton have continually to allow Defendant Kindred to remain under their employ with allegations of physical & verbal abuse against him towards staff, contractors & inmates.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 04/04/2019

Signature of Plaintiff

Printed Name of Plaintiff

Christopher Dolin

B. For Attorneys

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

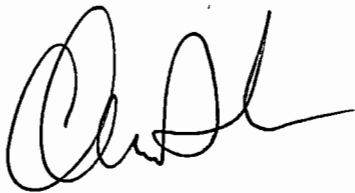
State and Zip Code

Telephone Number

E-mail Address

The defendant, Karen Craig, is a citizen of the State of Virginia.
The defendant, Jeffery Newton, is a citizen of the State of Virginia.

The defendant, Walter Minton, is a citizen of the State of Virginia.

A handwritten signature in black ink, appearing to read 'C. Dolin'.

Christopher Dolin
424 Brasen Drive
Apartment B2
Greenville, NC 27834
914-721-0321